

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
UNITED STATES OF AMERICA )

v. )

VLADISLAV KLYUSHIN )  
Defendant )  
\_\_\_\_\_ )

CRIMINAL NO. 21-cr-10104-PBS

**ASSENTED-TO MOTION FOR LEAVE TO FILE A RESPONSE TO MEMORANDUM  
OF THE UNITED STATES OPPOSING APPEAL OF MAGISTRATE JUDGE’S  
PRETRIAL DETENTION ORDER**

Now comes the Defendant Vladislav Klyushin, by and through undersigned counsel, and hereby respectfully requests leave to file a short response to the Government’s Memorandum Opposing Appeal of Magistrate Judge’s Pretrial Detention Order. As grounds and reasons therefore, the defense states that it seeks to address legal and factual issues that were raised by the Government’s brief that could not have been reasonably anticipated by the defense.

**WHEREFORE**, the defense respectfully requests this Honorable Court to grant its request.

**COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

The undersigned counsel has conferred with the Government, who by and through AUSAs Seth Kosto and Stephen Frank, assent to this request.

Respectfully Submitted,  
Vladislav Klyushin,  
By His Attorney,

**/s/ Maksim Nemtsev**  
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Dated: May 5, 2022

**CERTIFICATE OF SERVICE**

I, Maksim Nemtsev, hereby certify that on this date, May 5, 2022, a copy of the foregoing documents has been served via Electronic Court Filing system on all registered participants.

**/s/ Maksim Nemtsev**  
Maksim Nemtsev, Esq.